

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CHRISTOPHER TORRE,

Plaintiff,

v.

CHRISTINA KARDOONI, et al.,

Defendants.

Civil Action

Case No. 2:22-cv-04693-SDW-MAH

**NOTICE OF MOTION TO DISMISS
PURSUANT TO FED. R. CIV. P. 12(B)(2)
AND FED. R. CIV. P. 12(B)(6)**

PLEASE TAKE NOTICE that on **Monday, November 7, 2022 at 9:00 in the forenoon** or as soon thereafter as counsel may be heard, defendant Christina Kardooni (“Kardooni”), by and through her counsel, Fox Rothschild LLP, shall move before the United States District Court for the District of New Jersey pursuant to Fed. R. Civ. P. 12(b)(2) for an order dismissing plaintiff Christopher Torre’s (“Plaintiff”) Complaint or, in the alternative, pursuant to Fed. R. Civ. P. 12(b)(6) for an order dismissing Count One of Plaintiff’s Complaint, with prejudice..

PLEASE TAKE FURTHER NOTICE that in support of this motion, Kardooni shall rely upon the accompanying Memorandum of Law in Support of Motion and the Declaration of Christina Kardooni, along with the exhibit annexed thereto.

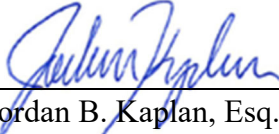
PLEASE TAKE FURTHER NOTICE that in accordance with L. Civ. R. 7.1(b), a proposed form of Order has also been supplied.

PLEASE TAKE FURTHER NOTICE that, pursuant to L. Civ. R. 7.1(b)(4), Kardooni hereby requests oral argument in the event that this motion is opposed.

Dated: September 26, 2022

FOX ROTHSCHILD LLP

Attorneys for defendant Christina Kardooni

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